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2 Nevada State Bar No. 11479  
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7 Attorney for Patrick Ryan  
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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 PATRICK RYAN,

15 Defendant.  
16

Case No. 2:18-mj-829-CWH

**STIPULATION TO MODIFY**  
**CONDITIONS OF PRETRIAL**  
**RELEASE**

17 COMES NOW the defendant, Patrick Ryan, by and through his counsel of record,  
18 Andrew Wong, Assistant Federal Public Defender, and Christopher Burton, Assistant United  
19 States Attorney, hereby submit this stipulation to modify Mr. Ryan's conditions of pretrial  
20 release.

21 DATED this 4<sup>th</sup> day of October, 2018.

22 RENE L. VALLADARES  
23 Federal Public Defender

24 By: /s/ Andrew Wong

25 ANDREW WONG  
Assistant Federal Public Defender  
26 Attorney for Patrick Ryan

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**POINTS AND AUTHORITIES**

1) On September 24, 2018, Mr. Ryan was released on a personal recognizance bond with conditions. *See* PR Bond, ECF No. 6. Condition 20 of Mr. Ryan's pretrial release restricts his travel to the state of Nevada.

2) Mr. Ryan has informed defense counsel that he has a job interview that will require him to travel out of state. If hired, Mr. Ryan's employer could require him to travel out of state as part of his employment. Mr. Ryan seeks to modify his conditions to permit travel outside of Nevada with preapproval from his pretrial services officer.

3) Pretrial Services Officer Emily McKillip has no opposition to modifying Mr. Ryan's conditions of pretrial release. Mr. Ryan has been fully compliant since being released under pretrial services supervision.

4) The government also has no opposition to this request.

Dated this 4<sup>th</sup> day of October, 2018.

RENE L. VALLADARES  
Federal Public Defender

DAYLE ELIESON  
United States Attorney

*/s/ Andrew Wong*  
By \_\_\_\_\_

ANDREW WONG  
Assistant Federal Public Defender

*/s/ Christopher Burton*  
By \_\_\_\_\_

CHRISTOPHER BURTON  
Assistant United States Attorney

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## PROPOSED ORDER

DATED this 5 day of October, 2018.

UNITED STATES MAGISTRATE JUDGE

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That on October 4, 2018, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

/s/ *Brandon Thomas*  
Employee of the Federal Public Defender